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March 11, 2025

**VIA ECF**

Hon. Cathy Seibel, U.S.D.J.

The Hon. Charles L. Brieant Jr.  
Federal Building and United States Courthouse  
300 Quarropas St.  
White Plains, NY 10601-4150

**Re: *Project Veritas et al. v. O’Keefe et al.*, No. 23-CV-04533-CS-AEK  
(S.D.N.Y.)**

Dear Judge Seibel:

I write on behalf of Plaintiffs Project Veritas and Project Veritas Action Fund (collectively, “Plaintiffs”), in accordance with Sections 1.A and 1.E of Your Honor’s Individual Rules of Practice, to request an adjournment of the case management conference currently scheduled to take place before Your Honor on March 20, 2025 (Dkt. 68 at ¶ 8).

On March 10, 2025, the parties appeared before the Honorable Andrew E. Krause, U.S.M.J., for a status conference, during which Plaintiffs requested a ninety-day extension of the current deadline for the close of fact discovery, in part, to accommodate Plaintiffs’ recent change in counsel. Defendants James O’Keefe and Transparency 1, LLC d/b/a O’Keefe Media Group (collectively, “Defendants”) did not oppose, and Judge Krause granted, Plaintiffs’ request for an extension. The parties continue to discuss settlement of this matter and Plaintiffs anticipate voluntarily dismissing their claims against Defendants upon receipt of a signed stipulation of dismissal from Defendants.

In view of the above, Plaintiffs respectfully submit that good cause exists for the requested adjournment, and respectfully request that the Court grant the requested adjournment. This is Plaintiffs’ first request for an adjournment of the March 20, 2025 case management conference.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Michael J. Harris", written in a cursive style.

Michael J. Harris